

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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IME WATCHDOG, INC.,

Plaintiff,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
GREGORY ELEFTERAKIS, ROMAN POLLAK,
ANTHONY BRIDDA, NICHOLAS ELEFTERAKIS,
NICHOLAS LIAKIS, and IME COMPANIONS LLC,

Defendants.

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SAFA GELARDI and IME COMPANIONS, LLC,

Third-Party Plaintiffs,

-against-

CARLOS ROA,

Third-Party Defendant.

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CARLOS ROA,

Third-Party Counter-Claimant,

-against-

SAFA ABDULRAHIM GELARDI, VITO GELARDI,
and IME COMPANIONS, LLC,

Third-Party Counter-Defendants.

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Case No.: 1:22-cv-1032 (PKC)(JRC)

**DECLARATION OF
JEFF BEIBIN**

JEFF BEIBIN, hereby declares and verifies the truth of the following, under penalty
of perjury under the laws of the United States of America, pursuant to Title 28, United States Code,
Section 1746:


1. I submit the instant declaration at the behest of defendants Safa A. Gelardi, Vito Gelardi and IME Companions, LLC ("Companions"), and I am fully familiar with the facts set forth herein.

2. I have been advised that the plaintiff in this lawsuit has alleged that I attended an Independent Medical Examination on March 16, 2023, at approximately noon, as "an agent of IME Companions at an IME located at 28 Sycamore Lane, Commack, NY 11725." Plaintiff is wrong.

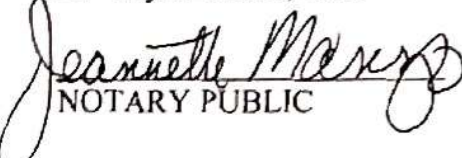
3. The truth is that I attended an IME at the above place and time as an agent of Client Exam Services, which is owned and operated by Fari Gutierrez. Redacted copies of the first two pages of my report for the IME appearance in question are annexed as Exhibit "A." My report confirms that I was not working for Companions as plaintiff has falsely alleged.

4. While I did see Mayra Gomez (and Carlos Roa) at the above time and place, neither Ms. Gomez nor Mr. Roa asked me for whom I was working. Nor did I tell them I was working for Companions. In any event, I was not working for Companions. I was working for Client Exam Services.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 24, 2023.


Jeff Berlin

Sworn to before me this
24th day of March, 2023


NOTARY PUBLIC

